UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON

AT SEATTLE

Plaintiff,

Defendant.

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THE HONORABLE JOHN C. COUGHENOUR

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RYAN HARNEY, individually, and as the

person PAMELA HARNEY, an individual,

personal representative of incapacitated

BLC FEDERAL WAY LH, LLC, d/b/a

Washington Limited Liability Company,

BROOKDALE FOUNDATION HOUSE, a

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v.

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Case No. 2:24-cv-01844-JCC

STIPULATED MOTION AND [PROPOSED] ORDER FOR EXTENSION OF INITIAL CASE MANAGEMENT DEADLINES

NOTE ON MOTION CALENDAR: JANUARY 9, 2025

Plaintiff Ryan Harney and Defendant BLC Federal Way LH, LLC, d/b/a Brookdale Foundation House ("Brookdale") jointly stipulate and request that the Court extend the Court's Initial Case Management Dates (dkt. # 10) until the Court rules on Brookdale's pending motion to compel arbitration ("Brookdale's Motion"). Brookdale's Motion is currently noted to be heard by the Court on January 15, 2025. Dkt. # 11.

Accordingly, the parties respectfully request that the Court enter the Proposed Order extending the initial case management deadlines as follows:

FRCP 26(f) Conference Deadline: 21 days after ruling on Brookdale's Motion

Initial Disclosure Deadline: 28 days after ruling on Brookdale's Motion

Joint Status Report Due: 35 days after ruling on Brookdale's Motion

STIPULATED MOTION AND ORDER FOR EXTENSION OF INITIAL CASE MANAGEMENT DEADLINES - 1 CASE NO. 2:24-cv-01844-JCC

BALLARD SPAHR LLP 1420 FIFTH AVENUE, SUITE 4200 P.O. BOX 91302 SEATTLE, WASHINGTON 98111-9402 206.223.7000 FAX: 206.223.7107

1 DATED: January 9, 2025 2 BALLARD SPAHR LLP 3 4 s/ Carin A. Marney By: 5 Carin A. Marney, WSBA No. 25132 Charles C. Huber, WSBA No. 18941 6 Jesse J. Flickinger, WSBA No. 59396 7 1420 Fifth Avenue, Suite 4200 P.O. Box 91302 8 Seattle, Washington 98111-9402 9 Telephone: 206.223.7000 10 Attorneys for Defendant BLC Federal Way LH, LLC, d/b/a Brookdale Foundation House 11 12 EVERGREEN PERSONAL INJURY COUNSEL 13 By: s/James W. McCormick 14 James W. McCormick, WSBA No. 32898 15 Neil P. Stubbs, WSBA No. 56890 16 100 South 9th Street Tacoma, WA 98402 17 Telephone: 253.472.6000 18 Attorneys for Plaintiff 19 I certify that this memorandum contains 119 words, in 20 compliance with the Court's Local Civil Rules. 21 22 23 24 25 26 27

STIPULATED MOTION AND ORDER FOR EXTENSION OF INITIAL CASE MANAGEMENT DEADLINES - 2 CASE NO. 2:24-cv-01844-JCC

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1 **ORDER** Having considered the parties' Stipulated Motion for Extension of Initial Case 2 Management Deadlines, the Court hereby ORDERS as follows: 3 The Stipulated Motion is GRANTED; and 1. 4 2. The Initial Case Management Dates are extended as follows: 5 FRCP 26(f) Conference Deadline: 21 days after ruling on Brookdale's Motion 6 **Initial Disclosure Deadline:** 28 days after ruling on Brookdale's Motion 7 **Joint Status Report Due:** 35 days after ruling on Brookdale's Motion 8 IT IS SO ORDERED. 9 DATED this 10th day of January, 2025. 10 11 12 13 John C. Coyheran 14 15 THE HONORABLE JÓHN C. COUGHENOUR 16 UNITED STATES DISTRICT COURT JUDGE 17 18 19 20 21 22 23 24 25 26 27